

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

Robert Dedmon,	§	CIVIL ACTION NO.
Plaintiff,	§	4:21-cv-03371
	§	
	§	JUDGE CHARLES ESKRIDGE
vs.	§	
	§	Jury Demand
Shell Exploration &	§	
Production Company and	§	
Shell Trading Services	§	
Company,	§	
Defendants.	§	

PLAINTIFF ROBERT DEDMON'S FIRST AMENDED EXHIBIT LIST

Robert Dedmon may offer or use any exhibit listed on Defendants' exhibit list, including any amended or supplemental exhibit list.

No.	DESCRIPTION	OFFER	OBJECT	DATE ADMIT	DATE N/ADMIT
2014 blank calendars					
1	January 2014 calendar [Dedmon 2886]				
2	February 2014 calendar [Dedmon 2830]				
3	March 2014 calendar [Dedmon 2831]				
2014 hiring decision					
4	April 2, 2024 email — Shell HR, Olmen, says March 1, 2014 promotion led to JG5 loss in Houston, HR decides job grades, concern about severance actions [ShellDedmon 705]				
5	February 19, 2014 & March 13, 2014 emails — as of March 13, 2014, job offer is out to another candidate, Dedmon went from #1 to #2, Dedmon hopes to find out why [Dedmon 805-806]				
6	March 31, 2014 emails — downgrading JG5 to JG6, different treatment based on POC status [ShellDedmon 706-707]				

7	March 31, 2014 emails — Shell manager disputes, with facts and reasoning, claimed business reason for JG downgrade [ShellDedmon 818-820]				
8	April 15, 2014 emails — transfer request to offer job at JG5 [ShellDedmon 813]				
9	April 17, 2014 email — deny request to offer job at JG5, will work with recruiting to keep candidate “warm” [ShellDedmon 717]				
10	April 22, 2014 email — request to offer job at JG6 to Dedmon, request for pay competitive to skill set so possibly at higher end of pay range, discomfort over different treatment based on POC status [ShellDedmon 716]				
11	April 22-23, 2014 emails — will respond next day [ShellDedmon 722]				
12	April 24, 2014 email — Dedmon extensive power market experience, resume attached [ShellDedmon 726 better copy of email; ShellDedmon 766-767 email with attached resume]				

13	April 24, 2014 emails — managers say Dedmon well-qualified, Shell HR requests proof from resume and interview notes, Hartnett OMG response [ShellDedmon 730-731, 725]				
14	April 24-25, 2014 emails — Shell HR will make determination after reviewing interview and selection notes, Shell manager asks what determination, already did candidate assessment, confusing to follow plot line [ShellDedmon 732-734]				
15	April 25, 2014 emails — Shell manager response showing Dedmon qualifications for job role [ShellDedmon 735-736]				
16	April 25, 2014 emails — Shell HR has “concerns about this particular candidate,” will evaluate whether any job offer is made at all, if at all will be JG6 [ShellDedmon 738-739]				
17	April 29, 2014 emails — bonus structure, no difference in JG5, JG6 job duties, Dedmon sales experience, Shell years of hires without prior sales experience like P. Frnka, M. Tickle, J. Promubol; forward to Hartnett [ShellDedmon 751-752, 744-747]				

18	April 30, 2014 emails — Shell HR, Olmen, says decision on offer likely next day, call yesterday about conversation with Shell manager Rangan and wants to talk more with Rangan about that [ShellDedmon 748-749]				
19	May 1, 2014 emails — Shell manager makes EO report, Shell HR concern about Dedmon fit is based on POC status, historically, POC candidates struggle to succeed at Shell; forwards email [ShellDedmon 753-754, 769]				
20	May 6, 2014 email — notifies Shell Ombudsman providing internal dispute resolution services, Sean Banks, of EO report about discrimination against Dedmon [ShellDedmon 755]				
21	May 8, 2014 email — request for update on Shell HR decision on whether to offer Dedmon a job [ShellDedmon 756-757]				
22	May 12, 2014 email — Shell HR, Olmen, says her explanation in discussing inside sales role for Dedmon followed “Shell’s policies and practices” [ShellDedmon 802]				

23	May 19, 2014 emails — posting job at JG6, Shell HR will say JG5 position closed and now filling similar but lower JG role to see if they're interested in reapplying; job posting attachment; cannot justify asking Dedmon to do same tasks [ShellDedmon 758-764, 768]				
24	May 20, 2014 emails — posting the job as sales position but will handle less complex deals [ShellDedmon 770-771]				
25	May 29, 2014 emails — Shell manager notifies Shell's United States Diversity, EEO, and Inclusion Advisor Erica Williams about EO report, sends information [ShellDedmon 774-775, 801]				
26	June 3, 2014 email — Shell recruiting will ask Dedmon if interested in new posted position that has lower JG and salary [ShellDedmon 798]				
27	June 4-5, 2014 emails — job reposted at JG6, offer and tell Dedmon this job is a lower JG than the job he previously interviewed for, Shell manager questions if there are any issues with pending EO investigation [ShellDedmon 778]				

28	June 11, 2014 emails — forward information to Shell's United States Diversity, EEO, and Inclusion Advisor Erica Williams, explains some of timeline for talking to Olmen [ShellDedmon 783-785, 786-787]				
2015 move to JG5					
29	2015 job candidate comparison matrix [ShellDedmon 109-111]				
30	February 6, 2015 email — applications closed, time to select candidate [ShellDedmon 112]				
31	February 8, 12 & 13, 2015 emails — move to JG5 for Dedmon, Shell HR Olmen still over inside sales team [ShellDedmon 97-98]				
32	February 10-11, 2015 emails — power sales position [ShellDedmon 849-857]				
33	February 19, 2015 emails — power sales position [ShellDedmon 893]				
34	February 21, 2015 transfer form — move to JG5 for Dedmon [ShellDedmon 99-100]				

35	March 17, 2015 Personnel Action Form — job grade and salary change [ShellDedmon 91]				
pay disparity, ongoing discrimination, Shell does not make up for past discrimination with JG5, compensation losses					
36	Federal Rule of Evidence 1006 pay disparity summary 2014 through 2024 [Dedmon 2887-2889]				
37	Federal Rule of Evidence 1006 pay disparity summary 2014 [Dedmon 2890]				
38	paystubs — used to calculate pay disparities for 2014 partial year starting August 19, 2014 (estimated because Shell did not provide pay data for this period for any other team member) [ShellDedmon 1104, 1109, 1572, 1597, 3639, 3650, 4052, 4064]				
39	Federal Rule of Evidence 1006 pay disparity summary 2015 [Dedmon 2891]				
40	paystubs — used to calculate pay disparities for 2015 (estimated because Shell did not provide pay data for this period for all team members) [ShellDedmon 1137, 1615, 3659, 4073]				

41	Federal Rule of Evidence 1006 pay disparity summary 2016 [Dedmon 2892]				
42	paystubs — used to calculate pay disparities for 2016 (estimated because Shell did not provide pay data for this period for all team members) [ShellDedmon 1160, 1660, 3700, 4097]				
43	Federal Rule of Evidence 1006 pay disparity summary 2017 [Dedmon 2893]				
44	paystubs — used to calculate pay disparities for 2017 (estimated because Shell did not provide pay data for this period for all team members) [ShellDedmon 1184, 1707, 3742, 4120]				
45	Federal Rule of Evidence 1006 pay disparity summary 2018 [Dedmon 2894]				
46	paystubs — used to calculate pay disparities for 2018 (estimated because Shell did not provide pay data for this period for all team members) [ShellDedmon 1218, 1776, 3808, 4156]				

47	Federal Rule of Evidence 1006 pay disparity summary 2019 [Dedmon 2895]				
48	paystubs — used to calculate pay disparities for 2019 (estimated because Shell did not provide pay data for this period for all team members) [ShellDedmon 1245, 1464, 1829, 3032, 3857]				
49	Federal Rule of Evidence 1006 pay disparity summary 2020 [Dedmon 2896]				
50	paystubs — used to calculate pay disparities for 2020 (estimated because Shell did not provide pay data for this period for all team members) [ShellDedmon 1272, 1491, 1882, 3060, 3910]				
51	Federal Rule of Evidence 1006 pay disparity summary 2021 [Dedmon 2897]				
52	paystubs — used to calculate pay disparities for 2021 (estimated because Shell did not provide pay data for this period for all team members) [ShellDedmon 1297, 1516, 1931, 3084, 3086, 3965]				

53	Federal Rule of Evidence 1006 pay disparity summary 2022 [Dedmon 2898]				
54	paystubs — used to calculate pay disparities for 2022 (estimated because Shell did not provide pay data for this period for all team members) [ShellDedmon 1322, 1541, 1980, 4010]				
55	Federal Rule of Evidence 1006 pay disparity summary 2023 [Dedmon 2899]				
56	paystubs — used to calculate pay disparities for 2023 (estimated because Shell did not provide pay data for this period for all team members) [ShellDedmon 4720, 4724, 4722, 4735, and 4727]				
57	Federal Rule of Evidence 1006 pay disparity summary 2024 [Dedmon 2900]				
58	paystubs — used to calculate pay disparities for 2024 through October 22, 2024 resignation date (estimated because Shell did not provide all pay data for this period and did not provide any pay data for some team members) [ShellDedmon 4719, 4723, 4721, 4733, 4725]				

59	Federal Rule of Evidence 1006 gross margin summary [Dedmon 2901]				
60	gross margin Dedmon [Dedmon 2846-2851]				
61	gross margin 2018 [Dedmon 2852-2855]				
62	gross margin 2019 [Dedmon 2856-2860]				
63	gross margin 2020 [Dedmon 2861-2866]				
64	gross margin 2021 [Dedmon 2867-2872]				
65	gross margin 2022 [Dedmon 2873-2878]				
66	gross margin 2023 [Dedmon 2879-2884]				
67	Frnka April 2014 start date and current employee status [ShellDedmon 816; Dedmon 2832]				
68	Shell 2020 mid-marketer [inside sales] organizational chart [ShellDedmon 1094]				

69	picture, some team members [Dedmon 2885]				
2014 estoppel					
70	January 17 & 22, 2014 emails, job not posted yet [Dedmon 762]				
71	January 24, 2014 email, application invite for sales representative job 4089BR [Dedmon 811]				
72	January 24 & 31, 2014 & February 3, 2014 emails, pre-interview, overqualified for position [Dedmon 827]				
73	January 25, 2014 application acknowledgement [Dedmon 834]				
74	February 1, 2 & 4, 2014 emails, initial February 4 teleconference, request for income information [Dedmon 849-854]				
75	February 3 & 5, 2014 emails, phone interview, loved him, he is 1 of 3 max to be invited for in-person interview [Dedmon 826]				

76	February 6, 2014 emails, comp little under base but higher bonus potential up to 50% [Dedmon 855-861]				
77	February 11 & 12, 2014 emails, February 18 in-person interview [Dedmon 862]				
78	February 14, 2014 emails, in-person interview for sales representative job 4089BR [Dedmon 830-831]				
79	February 19, 2014 email, post-interview, confirms two weeks to hear about status of candidacy [Dedmon 835]				
80	March 4, 2014 email, requesting update on status [Dedmon 829]				
81	April 23, 2014 emails showing Shell excuse for job grade [Dedmon 766]				
82	June 19-20, 2014 emails about re-applying for sales representative, again shows Shell excuse for job grade [Dedmon 838-840, 841-848]				

83	June 22, 2014 emails inviting Dedmon to apply for sale representative job 8401BR [Dedmon 810]				
84	June 30, 2014 email interview that afternoon [Dedmon 832-833]				
85	July 9, 2014 emails with benefits attachments, question about sign-on bonus [Dedmon 798]				
86	July 9-10, 2014 emails about sign on bonus and hard copy of offer letter [Dedmon 801]				
87	July 11, 2014 welcome emails after (oral) employment acceptance [Dedmon 479-480]				
88	July 11, 2014 Shell Exploration & Production Company conditional employment offer signed July 13, 2014 [ShellDedmon 113-116]				
89	July 11, 2014 email about “regret” for sales representative job 4089BR [Dedmon 803]				
90	July 24, 2014 pre-employment screening cleared, start date August 19, 2014 [Dedmon 769]				

91	August 7, 2014 email confirming offer of employment, start date August 19, 2014, need to complete new hire paperwork [Dedmon 792]				
92	2014 JG5-6 pay ranges [ShellDedmon 64]				
other					
93	Teri Ramsey (Olmen) LinkedIn profile [Dedmon 2827-2828]				
94	Frnka LinkedIn profile [Dedmon 2832]				
95	November 25, 2014 email Patrick Frnka steep learning curve [ShellDedmon 864]				
2020 revelation and prompt pursuit of rights					
96	2020-06-07 text message from Sri Rangan to Robert Dedmon [Dedmon 2822]				
97	October 16, 2020 charge of discrimination [ShellDedmon 65-67]				

98	April 20, 2021 email sending 2014 JG5-6 pay ranges (duplicate on exhibit list) [ShellDedmon 64]				
99	May 17, 2021 Shell's EEOC Position Statement [Dedmon 449-452]				
100	May 17, 2021 Shell's EEOC Position Statement [Attachment B Anti-Harassment Policy for 2020] [Dedmon 404]				
101	May 17, 2021 Shell's EEOC Position Statement [Attachment C 2015 Code of Conduct] [Dedmon 405-448]				
2021 man down on team and need to fill spot					
102	undated job broadcast form [ShellDedmon 1087-1093]				
103	September 14, 2021 email from M. Tickle [ShellDedmon 1073]				
performance reviews					
104	2014-2023 performance reviews—Robert Dedmon [ShellDedmon 4292-4328]				

105	2015-2023 performance reviews— Michael Deley [ShellDedmon 4329-4358]				
106	2014-2023 performance reviews— Patrick Frnka [ShellDedmon 4359-4402]				
107	2014-2023 performance reviews— Jennifer Hartnett [ShellDedmon 4403-4449]				
108	2014-2023 performance reviews— Doug Hund [ShellDedmon 4450-4491]				
109	2014-2023 performance reviews— Ryan Kolkmann [ShellDedmon 4492-4519]				
110	2019-2023 performance reviews— Logan Luzzi [ShellDedmon 4520-4529]				
111	2014-2020 performance reviews—Sri Rangan [ShellDedmon 4530-4555]				
112	2014-2019 performance reviews— Patty Smith [ShellDedmon 4556-4598]				

113	2014-2023 performance reviews— Susan Smith [ShellDedmon 4599-4637]				
114	2014-2023 performance reviews— Michael Tickle [ShellDedmon 4638-4710]				
compensatory damages					
115	2022-2023 Confidential medical records [Turner] [Dedmon2415-2436]				
116	2023 Confidential medical records [Davis] [Dedmon 2437-2446]				
117	April 10, 2023 Expert Disclosures [Jasmine Turner LPC Bio] [Dedmon 481-489]				
118	April 10, 2023 Expert Disclosures [Anatomy of Anxiety graphic] [Dedmon 490]				
119	April 10, 2023 Expert Disclosures [brain graphic] [Dedmon 491]				
120	April 10, 2023 Expert Disclosures [labeled brain graphic] [Dedmon 492]				

121	Headshot picture of Robert Dedmon [Dedmon 972]				
122	Picture of Robert Dedmon at Shell [Dedmon 2823]				
123	Robert Dedmon family pictures [Dedmon 1439-1465; 2824-2826]				
124	Picture—international day for the elimination of racial discrimination [Dedmon 2829]				
125	life tables [Dedmon 2902-2905]				
Shell policies					
126	2001 Shell website policy—an inclusive workplace [Dedmon 1003-1006]				
127	2005 Shell sustainability report [Dedmon 1014-1058]				
128	2006 Shell sustainability report [Dedmon 1129-1173]				
129	2010 code-of-conduct-english on 2014 website [Dedmon 201-240]				

130	2010 diversity-inclusion brochure linked on the 2014 website [Dedmon 248-256]				
131	2012 in review – numbers Royal Dutch Shell plc Sustainability Report on 2014-07 Shell website [Dedmon 257]				
132	2012 Royal Dutch Shell plc Sustainability Report - Social data on 2014-07 Shell Website [Dedmon 259]				
133	2014 Shell website entire_shell_sr13 [Sustainability Report] [No bates number]				
134	2014 Shell Annual Report [Dedmon 1-200]				
135	2014 Shell website eeoc gina supplement [Dedmon 241]				
136	2014 Shell website eeoc self print poster [Dedmon 242-243]				
137	2014 Shell website Trading - United States [Dedmon 244]				

138	2014 Shell general business principles [Dedmon 1007-1013]				
139	July 2014 Shell website - Our people - Shell Global [Dedmon 245-246]				
140	July 2014 Shell website - Diversity and inclusion – our approach - Shell Global [Dedmon 247]				
141	2015 Shell Code of Conduct English [Dedmon 260-303]				
142	2015 Shell Annual Report [No bates number]				
143	2020 Shell united states racial diversity equity and inclusion plan [Dedmon 312-314]				
144	2016 Barnes v. Shell example of helpline complaint memo [Dedmon 1512-1518]				
145	2020 Shell Website Race and Equity Combined Contents [Dedmon 315-319]				
146	2020 Shell Annual Report [No bates number]				

147	2020 Shell ethics and compliance manual [Dedmon 1059-1128]				
148	2021 shell annual report [No bates number]				
149	March 2021 Shell Global Helpline data privacy policy [Dedmon 1331-1335]				
150	May 17, 2021 Shell's EEOC Position Statement [Attachment A EO Policy for 2020] (duplicate on exhibit list) [Dedmon 403]				
151	May 17, 2021 Shell's EEOC Position Statement [Attachment B Anti-Harassment Policy for 2020] (duplicate on exhibit list) [Dedmon 404]				
152	May 17, 2021 Shell's EEOC Position Statement [Attachment C 2015 Code of Conduct] (duplicate on exhibit list) [Dedmon 405-448]				
153	2022 website shell global helpline [Dedmon 1226-1230]				
154	2023 Shell website [de&i] [Dedmon 988-1000]				

155	2023 Shell website [fair pay policy] [Dedmon 1001-1002]				
156	February 2024 Shell website fact sheet [Dedmon 2820-2821]				
Shell knowledge and history of discrimination					
157	1996 nyt shell oil's own little problem [Dedmon 2410-2414]				
158	2006 DOL press release re Shell E&P [Dedmon 2818-2819]				
159	2012 harvard business school global diversity and Inclusion at Royal Dutch Shell [No bates number]				
160	2014-2021 Shell EEO-1 Reports [Dedmon 973-987]				
161	2017-10-27 Rodriguez v. Shell charge of discrimination [Dedmon 2714-2717]				
162	2018 Shater Case Shell Oil EEOC Position Statement [Dedmon 320-343]				

163	2020 Shell UK diversity-pay-gap-report [Dedmon 304-311]				
164	2020-10-05 Shur v. Shell charge of discrimination [Dedmon 2718-2725]				
165	2021 shell uk pay gap report [Dedmon 2759-2772]				
166	July 16, 2021 Sheikh v. Shell charge of discrimination [Dedmon 2639-2644]				
167	2021-09 oilman magazine gaurdie banister [Dedmon 2374-2388]				
168	2022 shell uk pay gap report [Dedmon 2773-2793]				
169	2023 shell uk pay gap report [Dedmon 2794-2817]				

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